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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION**

**In re:
PG&E CORPORATION,**

– and –

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors
*All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Retained Trustee of PG&E Fire Victim Trust
under Order of the U.S. Bankruptcy Court
(N.D. Cal.) Case 19-30088 [Docket No. 6760]*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION REGARDING CLAIMS
ADMINISTRATOR'S REQUEST FOR
PG&E CONFIDENTIAL CUSTOMER
INFORMATION**

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors,
2 (collectively, “PG&E” or the “Debtors” or “Reorganized Debtors”) and the Hon. John K. Trotter (Ret.)
3 Retained Trustee of the PG&E Fire Victim Trust under Order of the U.S. Bankruptcy Court (N.D.
4 Cal.) in the above captioned case [Docket No. 6760] (the “Fire Victim Trustee”) hereby submit this
5 Stipulation regarding the Claims Administrator’s Request for PG&E Confidential Customer
6 Information in the claims administration process (the “Stipulation”). A proposed order approving the
7 Joint Stipulation is attached hereto as **Exhibit A**. PG&E and the Fire Victim Trustee hereby stipulate
8 and agree as follows:

9 **RECITALS**

10 WHEREAS, the Court entered a Confidentiality and Protective Order in this proceeding on
11 August 7, 2019 (Dkt. 3405), which the Court modified on August 4, 2020 (Dkt. 8662) (the “Protective
12 Order”);

13 WHEREAS, on June 20, 2020, the Court entered an Order Confirming Debtors’ and
14 Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization (Dkt. 8053), which provided for the
15 creation of a Fire Victim Trust to administer, process, settle, resolve, liquidate, satisfy, and pay all Fire
16 Victim Claims (§ 6.7(a));

17 WHEREAS, the goal of the Fire Victim Trust is to provide an efficient process to fairly
18 compensate the holders of timely filed Fire Victim Claims (respectively, “Claimants” and “Claims”)
19 in an equitable manner consistent with the principles set forth in the Claim Resolution Procedures and
20 the terms of the Trust Documents, the Plan, the Confirmation Order and California and federal law
21 (Fire Victim Trust Agreement, Dkt. 8507, Exhibit A at 50);

22 WHEREAS, PG&E possesses for its customers, including a number of individuals who have
23 submitted Claims to the Fire Victim Trust, certain customer-specific billing, financial and other
24 identifying information that is confidential, private or otherwise protected, including personally
25 identifiable information as defined in Section 8380 of the California Public Utilities Code,
26 Section 1798.80 et seq. of the California Civil Code, and electric and gas rules of Pacific Gas and
27 Electric Company, including Electric Rule 9.N and Gas Rule 27 (“Confidential Customer
28 Information”);

1 WHEREAS, in the course of reviewing Claims submitted to the Fire Victim Trust by customers
2 of PG&E, the Fire Victim Trustee and the Claims Administrator have asked PG&E to produce certain
3 Confidential Customer Information, including but not limited to, PG&E records of customer names
4 and addresses associated with Claimants' accounts at the time of claimed injuries, in order to assist
5 the Claimants to establish and verify proof of residence, which is a necessary precondition for
6 payment, and to assist the Claims Administrator in verifying information in submitted Claims;

7 WHEREAS, to achieve maximum fairness and efficiency, the Court entered an order
8 approving certain Fire Victim Claims Resolution Procedures, which provide that the Claims
9 Administrator may institute claim auditing procedures and other procedures to substantiate, verify and
10 distinguish legitimate claims (*Id.* at 50, 64);

11 WHEREAS, PG&E is willing to aid the Fire Victim Trustee and the Claims Administrator in
12 this process, but has informed them that, in the absence of individualized customer consent, PG&E
13 cannot disclose certain Confidential Customer Information to the Fire Victim Trustee or the Claims
14 Administrator unless ordered to do so by the Court;

15 **STIPULATION**

16 NOW, THEREFORE, the Fire Victim Trustee and PG&E have stipulated and agreed:

17 1. The recitals set forth above are hereby incorporated by reference as though fully set
18 forth herein.

19 2. In order to efficiently and fairly compensate Claimants, and to assist in claims
20 verification, the Fire Victims Trustee and the Claims Administrator have a compelling need that cannot
21 reasonably be accommodated by means other than for PG&E to disclose the Confidential Customer
22 Information to the Fire Victims Trustee and the Claims Administrator.

23 3. Upon order of the Court approving this Stipulation, PG&E shall provide or produce
24 Confidential Customer Information to the Fire Victim Trustee or the Claims Administrator to the
25 extent reasonably requested by the Fire Victim Trustee or the Claims Administrator in connection with
26 Claims submitted to the Fire Victim Trust.

27 ///

28 ///

4. All information provided to the Fire Victim Trust Claims Administrator pursuant to this Stipulation and Order shall be treated as Confidential Information under the terms of the Protective Order.

Dated: March 1, 2021

ACKNOWLEDGED AND AGREED:

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Retained Trustee of PG&E Fire Victim Trust
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EXHIBIT A

[Proposed] Order – Approving Joint Stipulation

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(N.D. Cal.) Case 19-30088 [Docket No. 6760]*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**[PROPOSED] ORDER APPROVING
STIPULATION REGARDING CLAIMS
ADMINISTRATOR'S REQUEST FOR
PG&E CONFIDENTIAL CUSTOMER
INFORMATION (DOCKET NO. [●])**

1 The Court, having considered the Stipulation Regarding the Claims Administrator's
2 Request for PG&E Confidential Customer Information filed on March 1, 2021, (Docket No. [●]),
3 (the "Joint Stipulation"), and good cause appearing therefor,

4 IT IS HEREBY ORDERED as follows:¹

5 1. The Joint Stipulation is hereby approved.

6 2. In order to efficiently and fairly compensate Claimants, and to assist the Claims
7 Administrator in verifying information, the Fire Victims Trustee and the Claims Administrator have a
8 compelling need that cannot reasonably be accommodated by means other than for PG&E to disclose
9 the Confidential Customer Information to the Fire Victims Trustee and the Claims Administrator.

10 3. Upon order of the Court approving the Stipulation, PG&E shall provide or
11 produce Confidential Customer Information to the Fire Victim Trustee and Claims Administrator to
12 the extent reasonably requested by the Fire Victim Trustee or Claims Administrator in connection with
13 Claims submitted to the Fire Victim Trust.

14 4. All information provided to the Fire Victim Trustee or Claims Administrator
15 pursuant to this Stipulation and Order shall be treated as Confidential Information under the terms of
16 the Protective Order.

17
18 ****END OF ORDER****
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28 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Joint Stipulation.